

EXHIBIT 2

Declaration of Wildfire Recovery Attorneys

I, Deborah S. Dixon, declare:

1. I am a partner in the joint venture, Wildfire Recovery Attorneys. Wildfire Recovery Attorneys represents approximately 940 individuals and businesses in their claims against PG&E relating to the Camp Fire.
2. I am one of the lead attorneys in preparing our individual clients' claims against PG&E, including, handling day-to-day communication with our clients and personally recording our clients' votes relating to the PG&E Proposed Plan. I have personal knowledge of the communications provided to our clients about voting on the PG&E Proposed Plan.
3. We have reviewed the filing, wherein an incomplete excerpt of one of our many confidential communications to our clients was attached as Exhibit 1. This excerpt does not provide the full content of the letter and is not reflective of the multitude and more recent communications directing our clients to affirmatively respond with a vote or their vote would not be recorded. We have never recorded a client's vote without receiving an actual communication from our client. We do not presume our clients will accept or reject the PG&E Plan.
4. Without revealing confidential attorney-client communications, Wildfire Recovery Attorneys has provided to each our clients the full disclosure statements approved by this Court and we have been in constant communication with our clients about the vote. Wildfire Recovery Attorneys has asked each of our clients to communicate their vote to us, by either accepting or rejecting the Proposed Plan through a "yes" or a "no" vote. We have held eight town-hall teleconferences, with three more scheduled and sent out six letters, via email and/or mail, to our clients explaining the importance of the vote and providing the opportunity for our clients to vote via email, telephone call or text message. The email and telephone number to call or text is the same number for accepting or rejecting the votes.
5. We are not making it more difficult for our clients to reject the Proposed Plan than to accept it. We have provided the exact same method and contact information for voting to our clients, without distinction of the "accept/yes" vote or "reject/no" vote.
6. As our clients respond with their vote, we have been individually recording each of our clients' votes on the Master Ballot as the votes are received from our clients. Our clients can vote, either by accepting or rejecting the Proposed Plan, through the same method and same contact information via direct email, telephone call or text message.
7. If a client has not affirmatively responded with an "accept/yes" or "reject/no" vote, we have not recorded any vote for that client. We only record a client's vote once the client has contacted the designated email/phone or text to provide their vote.

I declare under penalty of perjury and the laws of the State of California that the foregoing is true and correct.

Executed this 6th day of May, 2020 in San Diego California.

/s/ Deborah S. Dixon
Deborah S. Dixon, Esq.